

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE MF GLOBAL HOLDINGS LTD.  
INVESTMENT LITIGATION

Case No. 12-MD-2338 (VM)

JOSEPH DEANGELIS, et al.,

Plaintiffs,

- against -

Case No. 11-Civ-7866 (VM)

JON S. CORZINE, et al.,

Defendants.

**ECF CASE**

THIS DOCUMENT RELATES TO:

The Commodity Customer Class Action

**NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF PROPOSED  
SETTLEMENT WITH JPMORGAN CHASE BANK, N.A.**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's March 28, 2013 Order Preliminarily Approving Proposed Settlement and Providing for Notice, and upon the contemporaneously-filed: (i) Joint Declaration of Merrill G. Davidoff and Andrew J. Entwistle in Support of Plaintiffs' Motion for Final Approval of Settlement with JPMorgan Chase Bank, N.A., dated May 29, 2013, and exhibits thereto; (ii) Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Settlement with JPMorgan Chase Bank, N.A.; (iii) Joint Declaration of Merrill G. Davidoff and Andrew J. Entwistle in Support of Plaintiffs' Counsel's Motion for Award of Attorneys' Fees and Reimbursement of Litigation Expenses, and exhibits thereto; and (iv) Memorandum of Law in Support of Plaintiffs' Counsel's Motion for Award of Attorneys' Fees and Reimbursement of Litigation Expenses, as well as all

prior pleadings and proceedings in these consolidated class actions on behalf of former commodity customers of MF Global Inc. (“MFGI”), including the materials submitted in connection with the motion for preliminary approval, Plaintiffs Augustus International Master Fund L.P., Bearing Fund LP, Kay P. Tee, LLC, Mark Kennedy, Robert Marcin, Thomas G. Moran, Paradigm Global Fund I Ltd., Paradigm Equities Ltd., Paradigm Asia Fund Ltd., PS Energy Group, Inc., Summit Trust Company, Henry Rogers Varner Jr., and Thomas S. Wacker will move this Court on July 3, 2013 at 2:00 p.m., before the Honorable Victor Marrero, United States District Judge, in Courtroom 20B, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for entry of: (i) final judgment approving the Settlement with JPMorgan Chase Bank, N.A., substantially in the form of the proposed Final Judgment and Order of Dismissal with Prejudice attached hereto as Exhibit A; and (ii) final judgment approving the plan of allocation substantially in the form of the proposed Final Judgment and Order Approving Plan of Allocation, attached hereto as Exhibit B.

James W. Giddens, the trustee for the liquidation of MFGI pursuant to the Securities Investor Protection Act of 1970, 15 U.S.C. §§78aaa *et seq.*, successor-in-interest to MFGI and signatory to the Settlement, supports this motion and accompanying memorandum of law.

Dated: May 29, 2013

**ENTWISTLE & CAPPUCCI LLP**

/s/ Andrew J. Entwistle  
 Andrew J. Entwistle  
 Joshua K. Porter  
 280 Park Avenue, 26th Floor West  
 New York, New York 10017  
 Telephone: (212) 894-7200  
 Facsimile: (212) 894-7272

**BERGER & MONTAGUE, P.C.**

/s/ Merrill G. Davidoff  
 Merrill G. Davidoff  
 Michael Dell’Angelo  
 1622 Locust Street  
 Philadelphia, Pennsylvania 19103  
 Telephone: (215) 875-3000  
 Facsimile: (215) 875-4604

*Interim Co-Lead Counsel for the Plaintiff Customer Representatives*